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12 | *Counsel for Official Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

15 | In re:

16 | PG&E CORPORATION

17 || -and-

18 || **PACIFIC GAS AND ELECTRIC  
COMPANY,**

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

**(Jointly Administered)**

## Debtors

- Affects PG&E Corporation
  - Affects Pacific Gas and Electric Company
  - Affects both Debtors

**DECLARATION OF LAUREN T.  
ATTARD IN SUPPORT OF RESPONSE  
OF OFFICIAL COMMITTEE OF TORT  
CLAIMANTS TO DEBTORS'  
RESTATED RESTRUCTURING  
SUPPORT AND SETTLEMENT  
AGREEMENT WITH THE  
CONSENTING SUBROGATION  
CLAIMHOLDERS [DKT NO. 4554-1]**

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

1 LAUREN T. ATTARD, under penalty of perjury, declares:

2       1. I am an associate at Baker & Hostetler LLP, counsel to the Official Committee of  
3 Tort Claimants (the “**TCC**”) of PG&E Corporation and Pacific Gas and Electric Company (the  
4 “**Debtors**”) in these chapter 11 cases.

5       2. I submit this Declaration in support of the TCC’s response to the Debtors’ restated  
6 Restructuring Support and Settlement Agreement with the Consenting Subrogation Claim Holders.

7       3. Attached hereto as **EXHIBIT A** is a true and correct copy of a report issued by the  
8 California Department of Insurance, “North Bay Insured Losses from the October 2017 Wildfires,”  
9 dated May 18, 2018, which this firm obtained from the California Department of Insurance website,  
10 www.insurance.ca.gov, but no longer appears to be available on the website. This report states that  
11 the direct incurred losses for the 2017 North Bay Wildfires is \$9,731,079,051.

12       4. Attached hereto as **EXHIBIT B** is a true and correct copy of the report issued by  
13 the California Department of Insurance, “North Bay Insured Losses from the October 2018  
14 Wildfires,” dated April 30, 2019, available at [http://www.insurance.ca.gov/0400-news/0100-  
15 pressreleases/2019/upload/nr041-19InsuredLosses2018Wildfires050819.pdf](http://www.insurance.ca.gov/0400-news/0100-pressreleases/2019/upload/nr041-19InsuredLosses2018Wildfires050819.pdf). The report states  
16 that the Direct Incurred Losses for the 2018 Camp Fire (Butte) is \$8,473,363,059. This figure  
17 combined with the 2017 North Bay Wildfires above yields approximately \$18.2 billion.

18       5. Attached hereto as **EXHIBIT C** is the Motion of the Ad Hoc Group of Subrogation  
19 Claim Holders to Terminate the Debtors’ Exclusive Periods Pursuant to Section 1121(d)(1) of the  
20 Bankruptcy Code, dated July 23, 2019 (Dkt. No. 3147).

21       6. Attached hereto as **EXHIBIT D** is the Debtors’ Designation of Claims Filed by the  
22 United States of America, the State of California and Adventist Health System as Unliquidated and  
23 Subject to Estimation Under Section 502(c) of the Bankruptcy Code, dated November 1, 2019 (Dkt.  
24 No. 4553). The claims listed in this designation add up to approximately \$8.6 billion.

25       7. Attached hereto as **EXHIBIT E** is a true and correct copy of a portion of the  
26 transcript from the Estimation Status Conference on October 28, 2019 in the District Court.

27       8. Attached hereto as **EXHIBIT F** is a true and correct copy of a portion of PG&E’s  
28 Form 10-Q for the period ended September 30, 2019.

9. Attached hereto as **EXHIBIT G** is a true and correct copy of a portion PG&E's Form 8-K , dated June 18, 2019.

*Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.*

Dated: Los Angeles, CA  
November 8, 2019

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/s/ Lauren T. Attard  
Lauren T. Attard